

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MASSACHUSETTS

CRAIG DAVIS, as parent and
natural guardian of
ANDREW DAVIS,
Plaintiff,

vs.

CATAMOUNT DEVELOPMENT CORP.,
CATAMOUNT DEVELOPMENT CORP.
d/b/a CATAMOUNT SKI AREA,
Defendants.

CIVIL ACTION
No. 05-30011-MAP

JOINT MOTION TO AMEND THE SCHEDULING ORDER

The parties to the above-captioned action jointly move this Court to amend the scheduling order for the referenced matter as follows:

	<u>Existing</u>	<u>Proposed</u>
1. Written discovery completed:	November 30, 2005	January 30, 2006
2. Non-expert depositions completed:	December 30, 2005	March 2, 2006;
3. Counsel to appear for a Case Management conference:	January 9, 2006	March 9, 2006
4. Plaintiff to designate and disclose information regarding his trial experts:	February 15, 2006	April 14, 2006;
5. Defendants to designate and disclose information regarding its trial experts: by May 30, 2006;	March 30, 2006	May 30, 2006

6. All expert depositions completed: May 15, 2006 July 15, 2006.

In support of their motion, the parties state that the action was filed on January 14, 2005, and a Scheduling Order was issued on April 27, 2005. The case was assigned "fast track" status, and the discovery deadline was scheduled for November 30, 2005. Written discovery is progressing; but because the plaintiff is a minor, it has been difficult to schedule his deposition. Other depositions also need to be scheduled, and these have been delayed because of counsels' trial schedules. The parties need additional time to conduct the remaining discovery and narrow the issues for trial. In further support of this motion, the parties state that no party will be prejudiced by this motion.

Wherefore, the parties to this matter jointly request that the applicable scheduling order be amended.

Respectfully submitted,



William L. Keville, Jr.
BBO #546525
Margaret M. Carleen
BBO #655141
MELICK, PORTER & SHEA, LLP
28 State Street
Boston, MA 02109-1775
617-523-6200



Charles Ferris, Esq.
BBO #565630
500 Main Street
Great Barrington, MA 01230
413-528-8900

Dated: November 11, 2005